

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

**MAY 2018 GRAND JURY
(Impaneled 05/04/2018)**

THE UNITED STATES OF AMERICA

INDICTMENT

-vs-

TITUS THOMPSON

Violation:
Title 18, United States Code,
Section 922(g)(1)
(1 Count and Forfeiture Allegation)

COUNT 1

(Felon in Possession of Firearms and Ammunition)

The Grand Jury Charges That:

On or about May 18, 2018, in the Western District of New York, the defendant, **TITUS THOMPSON**, having previously been convicted on or about October 12, 2011, and on or about October 22, 2007, in County Court, Erie County, New York, of crimes punishable by imprisonment for a term exceeding one year, unlawfully did knowingly possess, in and affecting commerce, firearms and ammunition, namely:

- a. One (1) Glock, Model 23, .40 caliber pistol, bearing SN: DRY120US;
- b. One (1) FNH USA, Model FNS-9C, 9mm pistol, bearing SN: CSU0058308;
- c. One (1) Kel-Tec, CNC Industries, Model KSG 12 gauge shotgun, bearing SN: XXCN43;
- d. One (1) Ruger, Model P345, .45 caliber pistol, bearing SN: 66498388;
- e. One (1) Norinco SKS, 7.62 caliber rifle, bearing SN: 18020101N;

- f. One (1) Ruger Mini 14 .223 caliber rifle, bearing SN: 18379175;
- g. One (1) Norinco SKS, 7.62 caliber rifle, bearing SN: K6803;
- h. One (1) Romarm/Cugir, Model Draco, 7.62 caliber rifle, with obliterated serial number;
- i. One (1) Anderson Manufacturing Model AM15, multi-cal rifle, bearing SN: 15083351;
- j. One (1) Glock, Model GMBH 17, .9mm caliber pistol, bearing SN: FEM652
- k. One (1) Extar, Model EXP556, 5.56 caliber pistol, bearing SN: EP05129;
- l. 15 rounds of 5.56 ammunition;
- m. 36 rounds of Box Hansen .22 LR ammunition;
- n. Five (5) bags containing assorted ammunition;
- o. 16 rounds of assorted ammunition;
- p. One (1) round LC (Lake City) 5.56 caliber ammunition;
- q. Seven (7) rounds CCI .45 Auto ammunition;
- r. 157 rounds assorted ammunition;
- s. 140 rounds Wolf ammunition .762 caliber;
- t. 101 rounds Tula Cartridge Works-Russia ammunition 762 caliber;
- u. 106 rounds assorted ammunition; and
- v. 52 rounds assorted ammunition 40 caliber.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon his conviction on Count 1 of the Indictment, the defendant, **TITUS**

THOMPSON, shall forfeit his right, title and interest to the United States of any firearms and ammunition involved or used in the commission of the offense, or found in the possession or under his immediate control at the time of arrest, including, but not limited to:

- a. One (1) Glock, Model 23, .40 caliber pistol, bearing SN: DRY120US;
- b. One (1) FNH USA, Model FNS-9C, 9mm pistol, bearing SN: CSU0058308;
- c. One (1) Remington Arms Co., Inc., Bolt Action Score Master rifle, a 22 caliber, Model 511-X, bearing no serial number;
- d. One (1) Kel-Tec, CNC Industries, Model KSG 12 gauge shotgun, bearing SN: XXCN43;
- e. One (1) Ruger, Model P345, .45 caliber pistol, bearing SN: 66498388;
- f. One (1) Norinco SKS, 7.62 caliber rifle, bearing SN: 18020101N;
- g. One (1) Ruger Mini 14 .223 caliber rifle, bearing SN: 18379175;
- h. One (1) Norinco SKS, 7.62 caliber rifle, bearing SN: K6803;
- i. One (1) Romarm/Cugir, Model Draco, 7.62 caliber rifle, with obliterated serial number;
- j. One (1) Anderson Manufacturing Model AM15, multi-cal rifle, bearing SN: 15083351;
- k. One (1) Glock, Model GMBH 17, .9mm caliber pistol, bearing SN: FEM652
- l. One (1) Extar, Model EXP556, 5.56 caliber pistol, bearing SN: EP05129;
- m. 15 rounds of 5.56 ammunition;
- n. 36 rounds of Box Hansen .22 LR ammunition;
- o. Five (5) bags containing assorted ammunition;
- p. 16 rounds of assorted ammunition;
- q. One (1) round LC (Lake City) 5.56 caliber ammunition;
- r. Seven (7) rounds CCI .45 Auto ammunition;

- s. 157 rounds assorted ammunition;
- t. 140 rounds Wolf ammunition .762 caliber;
- u. 101 rounds Tula Cartridge Works-Russia ammunition 762 caliber;
- v. 106 rounds assorted ammunition; and
- w. 52 rounds assorted ammunition 40 caliber.

All pursuant to the provisions of Title 18, United States Code, Sections 924(d) and 3665, and Title 28, United States Code, Section 2461(c).

DATED: Buffalo, New York, June 14, 2018.

JAMES P. KENNEDY, JR.
United States Attorney

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A TRUE BILL:

S/FOREPERSON